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CALEB L. MCGILLVARY,

Plaintiff,

v.

RONALD RIEZ, et al.,

Defendant.

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**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW JERSEY**

CASE NO. 3:22-06430-MAS-JBD

DOCUMENT ELECTRONICALLY FILED

**DECLARATION OF MATTHEW C. WELLS,  
ESQ. IN SUPPORT OF DEFENDANT'S  
OPPOSITION TO PLAINTIFF'S MOTION TO  
COMPEL DISCOVERY**

I, Matthew C. Wells, Esq., declare under penalty of perjury pursuant to 20 U.S.C. §1746:

1. I am an attorney at law in the State of New Jersey and an associate with the law firm of Norris McLaughlin, P.A. ("NM"). NM has been retained by Rutgers, the State University of New Jersey to represent Defendant, Rahmo Riez ("Defendant") in the above-referenced matter. As such, I have knowledge of the facts set forth herein based on my personal knowledge and/or my review of NM's file for this matter, which is maintained in the ordinary course of business.

2. I make this Declaration in support of Defendant's opposition to Plaintiff's April 1, 2024 Motion to Compel Discovery. (ECF No. 43).

3. On January 17, 2024, I received a phone call from Plaintiff during which Plaintiff indicated that he had certain objections to Defendants' January 12, 2024 discovery responses.

4. I suggested to Plaintiff that Plaintiff provide this office with a letter outlining the asserted deficiencies with Defendant's discovery responses in writing, to which Defendant would respond accordingly.

5. Plaintiff thereafter served this office with correspondence dated January 30, 2024, outlining such asserted deficiencies (the "First Deficiency Letter"), which this office received on February 9, 2024.

I declare under penalty of perjury that the foregoing is true and correct.

/s/ Matthew C. Wells  
Matthew C. Wells

Dated: April 22, 2024